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Kathryn E. Cahoy

Covington & Burling LLP
3000 El Camino Real
5 Palo Alto Square, 10th Floor
Palo Alto, CA 94306-2112
T +1 650 632 4735
kcahoy@cov.com

By CM/ECF

April 18, 2024

The Honorable Mary Kay Vyskocil
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: Camacho v. American Express Company, Case No. 1:24-cv-02408 (S.D.N.Y.)

Dear Judge Vyskocil:

We represent Defendant American Express Company in the above-captioned matter and write, with the consent of Plaintiff, to request that the Court extend the time for American Express to answer or otherwise respond to the Complaint by 45 days—until June 7, 2024.

Plaintiff filed the Complaint in this action on March 29, 2024. (Dkt. 1). Plaintiff served American Express with the Complaint on April 2, 2024. (Dkt. 5). Pursuant to Federal Rule of Civil Procedure 12, absent an extension, American Express's deadline to answer or otherwise respond to the Complaint is April 23, 2024.

American Express respectfully requests a 45-day extension of its time to answer or otherwise respond to the Complaint—i.e., until June 7, 2024. Good cause exists for the requested extension because American Express recently engaged the undersigned counsel, and additional time is required to evaluate the claims and allegations in the Complaint and to prepare a response.

Plaintiff has consented to this extension request. Neither American Express nor Plaintiff has submitted any previous requests for an adjournment or extension in this action. The requested extension will not affect any other deadlines in this case.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Kathryn E. Cahoy

Kathryn E. Cahoy